

FILED

UNITED STATES BANKRUPTCY COURT
District of Maryland

2015 AUG -6 PM 2: 22

U.S. BANKRUPTCY COURT
DISTRICT OF MARYLAND
BALTIMORE

NATIONSTAR MORTGAGE LLC)	Case Number: 15-15219
Movant)	Chapter 7
v.)	
Herdisene McIntyre Green)	Objection to Amended Motion For
Respondent)	Relief From Automatic Stay
)	
GEORGE LIEBMANN)	
CHAPTER 7 TRUSTEE)	

OBJECTION TO AMENDED MOTION FOR RELIEF
FROM AUTOMATIC STAY FILED 07/20/15

COMES NOW, Respondent, Herdisene McIntyre Green, with the following
objections to Movant's Motion for Relief From Automatic Stay.

Movant's claims:

1. No objection to jurisdiction.
2. No objection to statement converted to Chapter 7.
3. No objection to George Liebmann as Chapter 7 Trustee.
4. *Objection. How can you own a piece of property when you are holding it under a leasehold? I don't think such is possible. Further, as stated in the previous objection, Sherry Properties, Inc. did NOT convey the lot of ground to Respondent, Herdisene McIntyre Green. Sherry Properties, Inc. did an assignment of rights and interests in the lot of ground and buildings thereon, subject to a non-expiry lease with semi-annual payments of \$60.00. Respondent, Herdisene McIntyre Green, pays "ground rent" to Sherry Properties, Inc.*

JSHK

1 5. **Objection.** *Movant has not made original documents available for examination so that*
2 *Respondent, Herdisene McIntyre Green, can determine their authenticity.*

3 6. **Objection.** *Respondent, Herdisene McIntyre Green, denies that she owes any debt to*
4 *Movant..*

5 7. **Objection.** *Movant has refused to validate the alleged debt. Respondent, Herdisene*
6 *McIntyre Green, denies being in default on any debt.*

7 8. **Objection.** *Same as #7.*

8 9. **Objection.** *Same as #7. Also, what is the alleged cause of the dissipation of equity in*
9 *the alleged Debtor's residence. No evidence has been entered to show a dissipation.*

10 10. **Objection.** *Movant offers no evidence to support its claim that Movant continues to be*
11 *irreparably injured by the stay. How is loss of revenue an irreparable injury? Loss of*
12 *revenue, the only injury Movant can possibly be suffering is not irreparable.*

13 11. **Objection.** *Movant has failed to show cause upon which relief can be granted.*
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15 Furthermore, Respondent, Herdisene McIntyre Green, has and continues to make the
16 Court aware that Respondent is a disabled person and is covered by the provisions of the
17 Americans with Disabilities Act. Movant has not addressed that fact, even though Respondent
18 believes them to be knowledgeable of such fact. Before this Court can grant a Relief from
19 Automatic Stay, it must first schedule an accommodation hearing for the Respondent, in which
20 hearing Movant must provide a detail summary of how Respondent will be accommodated in
1 the removal of Respondent from her property.
2

3 Additionally, Respondent, Herdisene McIntyre Green, motions this Court, that in the
4 event it decides to lift the Automatic Stay, that this Court will issue an Order in the form of a

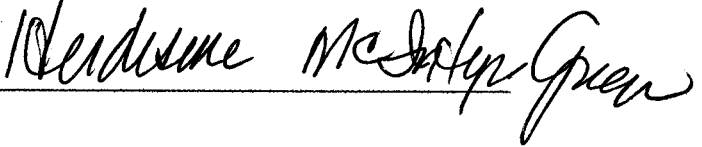
1 The Movant, NATIONSTAR MORTGAGE, LLC, cannot be allowed to sell the property and
2 yet still keep the Promissory Note and the profits earned therefrom, because that would be
3 unjust enrichment. Furthermore, the Promissory Note and Deed of Trust are the chattel
4 property of Respondent, Herdisene McIntyre Green, and must be returned.

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6 **VERIFICATION**
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8 I, Herdisene McIntyre Green hereby states, declares, verifies and affirms under penalty
9 of perjury, under the laws of the United States of America and the State of Maryland, that I,
10 Herdisene McIntyre Green, have read the foregoing and know the contents thereof; that the
11 same is true and correct based on the undersigned's own knowledge to the best of the
12 undersigned's current information, knowledge, comprehension and belief.

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14
15 Dated: 1 day of August, 2015
16

17 Herdisene McIntyre Green

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In re: Case No. 15-15219 Chapter 7
Herdisene McIntyre Green
Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the Response to Objection to Confirmation, filed by Herdisene McIntyre Green, has been sent to the parties listed below via USPS pre-paid First Class Mail on July ____, 2015.

Copies Mailed to:

NATIONSTAR MORTGAGE
8950 Cypress Waters Blvd
COPPELL, TX 75019

Mark D. Meyer, Esq.
Rosenberg & Associates, LLC
7910 Woodmont Avenue, Suite 750
Bethesda, Maryland 20814

GEORGE LIEBMANN
CHAPTER 7 TRUSTEE
8 West Hamilton Street
Baltimore, MD 21201

Dated this 31 Day of July, 2015


Herdisene McIntyre Green

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